

# EXHIBIT 4

MO POW 3 and MO POW 4 v. Crypto Infiniti

1:22-CV-155-SWS

1

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF WYOMING

3 -----

4 MO POW 3, LLC, and  
MO POW 4, LLC,

5 Plaintiffs,

6 vs. Case No. 1:22-CV-155-SWS

7 CRYPTO INFINITY, LLC,

8 Defendant.

9 -----  
10 30 (b) (6) VIDEOCONFERENCE DEPOSITION OF JINWEI ZHANG  
11 Taken in behalf of Plaintiffs

12 9:55 a.m., Thursday  
November 16, 2023  
13

14 PURSUANT TO NOTICE, the 30(b) (6) videoconference  
15 deposition of JINWEI ZHANG was taken in accordance with  
16 the applicable Federal Rules of Civil Procedure before  
17 Randy A. Hatlestad, a Registered Merit Reporter and a  
18 Notary Public in and for the State of Wyoming.

19

20

21

22

23

24

25

1 A. Cost of capital.

2 Q. Let's take those in sequence. What is the  
3 total lost income Crypto alleges it has suffered in this  
4 case?

5 A. That, I have to go back to calculate them day  
6 by day. And I can't give you a number at the moment,  
7 because as each day goes by, there will be more loss of  
8 income. The loss of income will be calculated based on  
9 the amount generated minus amount over what's needed to  
10 pay to Mr. Guel. And every single day, that will be a  
11 different number.

12 Q. What has Crypto Infiniti done to mitigate the  
13 loss of income?

14 A. We tried to find the other site to be able to  
15 host us, but we have not successfully found a location  
16 for all our miners. So we have a loss of miners in the  
17 Utah facility. Sorry. I need to add one more thing.  
18 The cost of our facility will have the storage of those  
19 miners.

20 Q. Let's stay on the cost of the storage. What is  
21 the cost to Crypto Infiniti of storing the miners?

22 A. I have to check on the invoice that we get from  
23 the Utah facility. And I can get that to you later.

24 Q. I think the other category you mentioned was  
25 cost of capital. Why does Crypto Infiniti assert it has

1 suffered cost-of-capital damages in this case?

2 A. Well, we paid Mr. Guel over \$4 million. And  
3 the \$4 million has a cost for us to get it and also  
4 has -- if we invest in another place in order to have  
5 income, that is also a loss. So the cost of capital has  
6 a category underneath that. Simply, inflation would put  
7 the capital in the bank, how much interest we're going to  
8 make. And then there's also loss of investment  
9 opportunity. And there's also kind of the cost of  
10 capital of things we could -- anyway, so it's lost  
11 opportunity to invest in capital and the cost of the  
12 inflation and everything and depreciation of money.  
13 There's just a lot of things including the cost of  
14 capital.

15 Q. What is the amount of cost-of-capital damages  
16 Crypto alleges it has suffered in this case?

17 A. We have to look into that. We can give you a  
18 number later. And I think as each single day passes by,  
19 that number changes. With current, the interest rate is  
20 so high. I believe it's probably even higher every  
21 single day. Hard for me to just give you a number at the  
22 moment.

23 Q. For the cost-of-capital calculation, is that a  
24 number that your accounting or someone who handles your  
25 finances would need to generate?

## MO POW 3 and MO POW 4 v. Crypto Infiniti

1:22-CV-155-SWS

65

1           A.       Yes.   That's correct.   I would rely on  
2 professionals to generate that.

3 Q. Does Crypto Infiniti contend that MO POW 3 has  
4 a duty to refund the approximately \$4.1 million paid in  
5 this case?

6           A.       Yes.  The hosting service which was never  
7       provided to us.

8 MR. POPE: Give me one second to double-  
9 check my notes, and then I think I'll be able to wrap up.  
10 Give me just one second.

11 (Pause in proceedings.)

12 MR. POPE: I don't have any more  
13 questions. I just wanted -- your lawyer will have the  
14 opportunity to ask questions if he'd like. But I just  
15 wanted to say thank you for your time. I appreciate your  
16 attention.

17 THE DEPONENT: Thank you, Jeffrey.

18 MR. GARRETT: No questions from me. We'll  
19 review and sign.

20 (Deposition proceedings concluded

12:11 p.m., November 16, 2023.)

22

23

24

25

1 C E R T I F I C A T E

2

3 I, RANDY A. HATLESTAD, a Registered Merit  
4 Reporter and a Notary Public of the State of Wyoming, do  
5 hereby certify that the aforementioned deponent was by me  
6 first duly sworn to testify to the truth, the whole  
7 truth, and nothing but the truth;

8 That the foregoing transcript is a true record  
9 of the testimony given by the said deponent, together  
10 with all other proceedings herein contained.

11 IN WITNESS WHEREOF, I have hereunto set my hand  
12 and affixed my notarial seal this 4th day of December,  
13 2023.

14

15

16

17

18

19

20

21

22

23 My Commission Expires April 2, 2024.

24

25